

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

HUAWEI TECHNOLOGIES CO., LTD.;
HUAWEI DEVICE CO., LTD.;
HUAWEI DEVICE (SHENZHEN) CO., LTD.,

Plaintiffs,

v.

PANOPTIS PATENT MANAGEMENT, LLC,

Defendant.

Civil Action No. 1:24-cv-4708-AKH

Jury Trial Demanded

PANOPTIS PATENT MANAGEMENT, LLC;
PANOPTIS EQUITY HOLDINGS, LLC; OPTIS
WIRELESS TECHNOLOGY, LLC; OPTIS
CELLULAR TECHNOLOGY, LLC; UNWIRED
PLANET INTERNATIONAL LIMITED,

Counterclaim-Plaintiffs,

v.

HUAWEI TECHNOLOGIES CO., LTD.; HUAWEI
DEVICE CO., LTD.; HUAWEI DEVICE
(SHENZHEN) CO., LTD.,

Counterclaim-Defendants.

HUAWEI'S NOTICE OF MOTION FOR LEAVE TO:

**(1) FILE UNDER SEAL HUAWEI'S UNREDACTED OPPOSITION TO PANOPTIS'S
MOTION TO DISMISS AND SUPPORTING EXHIBITS; AND (2) PUBLICLY FILE
HUAWEI'S REDACTED OPPOSITION TO PANOPTIS'S MOTION TO DISMISS
AND SUPPORTING EXHIBITS**

*So ordered
8-6-25
[Signature]*

PLEASE TAKE NOTICE that Plaintiffs/Counterclaim-Defendants Huawei Technologies Co., Ltd.; Huawei Device Co., Ltd.; and Huawei Device (Shenzhen) Co., Ltd. (collectively, “Huawei”), by and through the undersigned counsel, hereby move the Court for entry of an order granting Huawei leave to: (1) file under seal the unredacted version of Huawei’s Opposition to PanOptis’s Motion to Dismiss and supporting exhibits 1-3, and (2) publicly file the redacted versions of Huawei’s Opposition to PanOptis’s Motion to Dismiss and supporting exhibits 1-3.

The grounds for this motion are set forth in the accompanying Memorandum of Law and Declaration of Lance W. Shapiro.

Dated: August 5, 2025

By: /s/ Lance W. Shapiro

Kevin J. Post (NY Bar No. 4382214)
Lance W. Shapiro (NY Bar No. 5397955)
Meredith E. Cox (NY Bar No. 5955174)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036
Telephone: (212) 596-9000
kevin.post@ropesgray.com
lance.shapiro@ropesgray.com
meredith.cox@ropesgray.com

Matthew J. Rizzolo (NY Bar No. 4661344)
ROPES & GRAY LLP
2099 Pennsylvania Avenue, N.W.
Washington, DC 20006-6807
Telephone: (202) 508-4600
matthew.rizzolo@ropesgray.com

Attorneys for Huawei